

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA,

v.

Crim. No. 2:16-cr-84

ALISON GU, a/k/a “Alison Ling,”  
“Ally Koo,” “Ai J. Chen,” “Ai Jen  
Chen,”  
“Jing Shao,” “Yijing Gu,” “Yijing  
Lin,”  
“Alison Yi Gu,”  
Defendant.

**UNITED STATES' MOTION**  
**TO REVOKE DEFENDANT'S RELEASE ORDER**

The United States of America, by and through its attorney, Eugenia A.P. Cowles, Acting United States Attorney for the District of Vermont, hereby requests, pursuant to 18 U.S.C. § 3148, that this Court require defendant Gu to show cause why the Court should not revoke her release order. The basis for the government's motion is the information supplied in the March 1, 2017, Pretrial Supervision Status Report, of Probation Officer John Bendzunas, which will be further established by evidence presented at the upcoming Bond hearing at which Agent Jeremy Stalla of the United States Department of State, Diplomatic Security Service is expected to testify that that Gu presented a document purporting to be an affidavit notarized by consular officials in Singapore, falsely purporting to bear a

seal of the United States Consular Service, to the Circuit Court of the 18<sup>th</sup> Judicial Circuit and for Brevard County, Florida, thus violating 18 U.S.C. § 1017.<sup>1</sup>

Gu was released on conditions that she refrain from committing crimes while on release. As the anticipated testimony will establish, there is probable cause to conclude that Gu committed a federal felony while on conditions. Under these circumstances, Gu presents a threat to the community that she will continue to engage fraudulent conduct and avoid the supervision of this Court, as further suggested by Officer Bendzunas' Status Report.

Based on these facts there is clear and convincing evidence that the defendant has violated her conditions of release, and there is probable cause to believe that the defendant has committed a Federal, State, or local crime. 18 U.S.C. § 3148(b)(1)(A)-(B).

Accordingly, the government requests that the Court grant this motion following the presentation of evidence at the upcoming hearing, revoking Gu's release on conditions.

Dated at Burlington, in the District of Vermont, March 10, 2017.

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<sup>1</sup> 18 U.S.C. § 1017 provides: "Whoever fraudulently or wrongfully affixes or impresses the seal of any department or agency of the United States, to or upon any . . . document, or paper or with knowledge of its fraudulent character, with wrongful or fraudulent intent, uses . . . any such document, or paper, to which or upon which said seal has been so fraudulently affixed or impressed shall be fined under this title or imprisoned not more than five years, or both.

Respectfully submitted,

UNITED STATES OF  
AMERICA

EUGENIA A.P. COWLES  
Acting United States Attorney

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Certificate of Service,

By filing the above document via the Court's electronic filing system, a copy will be served on David McColgin, Counsel for Defendant.

March 10, 2017

*Michael P. Drescher*